Feedback - Guidance on the Implementation of Plan S

Question 1 - Is there anything unclear or are there any issues that have not been addressed by the guidance document?

1. **Aim and scope of Plan S**

- Although the general aim and scope of Plan S is welcomed, many implementation aspects are still not well defined and require more clarification.
  Further consultation and dialogue with universities and the scholarly community is needed for the definition of Plan S' implementation paths, to understand the impact that Plan S will have on different disciplinary fields but also how a systemic change towards Open Access can be achieved in a collaborative effort. Consequences of the implementation of Plan S can be particularly problematic for:
  o Small, new and interdisciplinary subject areas
  o Subject areas which currently do not have recognised Open Access channels
  o Temporary academic staff
  o Recruitment processes for researchers from countries which are not subject to Plan S
  o Co-publication with researchers not subject to Plan S

- It must be noted that the principles of the San Francisco Declaration on Research Assessment (DORA), that is to shift the focus to the content and quality of research outputs, are not yet universally implemented at the institutional and funder level.
  It is undoubtedly problematic to take a journal metric or brand as a proxy for the impact or quality of an individual article. Nevertheless, especially in the formal and natural sciences publications in prestigious and highly cited journals are still considered to be an essential factor in evaluations, for the acquisition of external funds, and to be considered for science awards or for professorships. cOAlition S supports DORA and calls for assessing researchers based on their own merits rather than on the basis of the venue in which their research is published. However, the Guidance does not provide further information on the measures envisaged to make this change happen, nor does it offer a timeline or a forecast of the possible impact (also on a global scale). Without this information, it is very difficult for universities and researchers to predict the impact (and therefore commit) to Plan S and understand how this will affect researchers' careers.

- Plan S misses out on the chance to ask for a strong push for securing and enforcing author rights for immediate self-archiving of the final author manuscript (with application of a Creative Commons / open content license), regardless of the wording of the publishing contract – through European regulations and national copyright as well as international agreements.

- Plan S also underestimates the role of repositories in scholarly communication and the requirements set will be very difficult to meet, especially for universities that have neither the

technical resources nor the rights to develop their own repository environments and thus provide compliant solutions.

2. Plan S compliance

- For more clarity, the Guidance should explicitly state that publishing in journals that do not conform to the Plan S criteria is possible as long as any and all APC charges are covered by other means of financing (e.g. institutional funds).

- Requirements for co-publishing with researchers who are not subject to Plan S need to be spelled out and the consequent implications evaluated.

- The Guidance states that cOAlition S will identify and signal which publication venues are Plan S compliant in collaboration with the Directory of Open Access Journals (DOAJ) and the Directory of Open Access Repositories (OpenDOAR). This list of compliant venues should be in place before the implementation starts and funders should take the responsibility of maintaining and updating this list constantly. The Guidance should also include a strategy to ensure the sustainability of these directories.

3. Publication costs

- Further clarifications are needed on how cOAlition S will contribute to establishing a fair and reasonable level of article processing charges (APCs). As argued by the Fair Open Access Alliance (FOAA), full transparency on publication costs borne by publishers will be a necessary condition in this regard and possible APC caps should be informed mostly by publishers' costs breakdowns.[1].

- However, it seems unlikely that standardising and setting a cap to the funders' reimbursement for the APCs will prevent publishers from raising their prices. Publishers still negotiate from a position of strength because high impact subscription/hybrid journals are still the preferred publication venues of researchers. Open Access journals have lower citation rates and impact factors than the most established journals and may face challenges in establishing comparable reputation in and recognition from the different research communities. Consequently, it is to be expected that many researchers will still aim to publish in the former. The question is who will then pay for the APCs. We feel that there is a risk that it will be the researchers' institution. This should be avoided: if there is to be a transition from a subscription model to an APC model, it must be sustainable for all funders and universities alike.

4. Supporting Quality Open Access Journals and Platforms

- cOAlition S seems to underestimate the amount of time and effort required to establish and develop new publication venues relevant and reputable for a particular discipline. Establishing new publication venues and have researchers adopt them is a lengthy process and this is not taken into account in the Plan S timeline. Collaboration between funders, university libraries and disciplinary communities will be crucial to identify disciplines where Open Access journals, platforms or infrastructures are needed before Plan S is implemented.

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[1] Fair Open Access Alliance (2018) FOAA Board recommendations for the implementation of Plan S. Available at: https://www.fairopenaccess.org/wp-content/uploads/2018/10/Fair-Open-Access-Alliance-recommendations-Plan-S.pdf

- In addition to creating new venues, special emphasis should be placed on working with existing subscription journals to convert their business model into full Open Access. An example of a possible support mechanism which is already in place is the Open Library of Humanities.

5. Timeline

- A realistic timeline is needed, which allows enough time to clarify and prepare for the significant economical and practical implications of Plan S and thus avoid possible unintended, and perhaps even disruptive consequences.

6. Review

- The review process should have a broader focus and be carried out not only "ex-post", but also "ex-ante". Considering the fact that many aspects of Plan S are not defined, an ex-ante review should map elements of uncertainty and provide suggestions for workarounds.

7. Compliance and Sanctioning

- The Guidance should clarify the form of sanctioning when funded researchers publish outside Plan S compliant journals.

- Exemption schemes and staggered levels of sanctioning in cases of non-compliance should be foreseen, at least for an initial phase of Plan S.

Technical Guidance and Requirements

8. Licencing and Rights

- The requirements regarding open licenses seem too restrictive. We therefore recommend Plan S to change this requirement and to add an exemption clause for the use of the Creative Commons CC-BY-NC and CC-BY-ND variants, to take into account the needs of specific disciplines and communities. For example, as stressed in the British Academy's response to Plan S, including ND licenses is particularly important for the SSH.[2]

- Intellectual property rights and patent protection should also be given proper consideration when defining permitted licences.

9. Open Access Journals and Platforms

- The following criterion needs clarification: "The journal/platform must provide automatic APC waivers for authors from low-income countries and discounts for authors form middle-income countries". What is an acceptable level for discounts, and what should the income limits be? This kind of specification is especially important, so authors know where they can submit their works.

- Mandatory requirements (such as automatic APC waiver) will be more difficult for smaller/independent journals to comply with than for large publishers with established and streamlined solutions. However, smaller/independent journals are an important publication venue for niche research, which is often poorly funded.

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[2] British Academy (2018) Science Europe's Plan S: making it work for all researchers. Available at: https://www.thebritishacademy.ac.uk/sites/default/files/British_Academy_paper_on_Science_Europe_Plan_S.pdf

10. Deposition of Scholarly Content in Open Access Repositories

- Repositories' technical requirements should be recommendations and not made mandatory. Indeed, the technical requirements for Open Access repositories as envisaged by Plan S present challenges that will make it difficult for universities and other organisations, without the technical resources or the rights to develop their own repositories environments, to provide compliant solutions.

- Prohibiting embargos outright needs to be reconsidered to take practical aspects into account. For example, embargos do not necessarily result in substantial disadvantages for research colleagues or the general public.

11. Transformative agreements

- The Guidance should clarify if the new transformative agreements starting form 2020 shall be signed by each single institution/consortium or whether it will be sufficient that researchers choose to publish in publication venues that are included in a transformative agreement signed by other institutions. This aspect is important and very delicate because universities will continue to sign contracts with hybrid journals to offer researchers documentation for teaching and research.

- The Guidance should discourage the proliferation of mirror journals as they pose some major concerns for the identification of the publication venues and their content. In fact, some mirror journals have been assigned proper ISSN which are not automatically linked to the ISSN of the original title, making them appear as completely different publications and causing problems in the citation and statistics counts.

Question 2 - Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?

- cOAlition S should establish a structured dialogue with universities and the academic community, to further consult them and incorporate their feedback in the implementation of Plan S.

- Plan S places a strong focus on APC-driven publication venues. However, no-(author)fee publication venues (diamond/platinum OA) are particularly important for the development of a healthy Open Access ecosystem, especially for unfunded researchers.

- Plan S should plan measures that tackle low interest in publishing Open Access (e.g. insufficient financial resources for the construction and maintenance of repositories or for publishing in Open Access, policy of publishers, lack of visible training activities related to Open Access).

- Plan S must cover the need for transparency in management and monitoring of compliance. It is imperative that these functions remain in neutral, transparent and open source hands.